

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA §
 §
VS. § CRIMINAL NO. H-15-510
 §
GREGG CARL BAIRD §

**DEFENDANT'S UNOPPOSED MOTION FOR AN
EXTENSION OF TIME TO FILE PRE-TRIAL MOTIONS**

TO THE HONORABLE DAVID HITTNER:

Gregg Carl Baird files Defendant's Unopposed Motion For An Extension Of Time To File Pre-Trial Motions, and for cause would show as follows:

I.

Defendant is charged with receipt of child pornography, in violation of 18 U.S.C. § 2252A(a)(2)(B) (count one); access with intent to view child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B) (count two); and possession of child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B) (count three). He is detained pending trial. His pre-trial motions are due on October 28, 2015; the Government's responses are due on November 18; and a jury trial is scheduled for January 11, 2016.

II.

The Government and counsel for defendant need more time to determine whether the case can be resolved without a trial or, if not, to prepare for trial.

Counsel does not want to file motions and cause the Government to expend its valuable time responding if the case can be resolved without a trial. Accordingly, counsel requests a continuance of the October 28 motions deadline, as well as the Government's deadline to respond. Counsel proposes a new motions deadline of November 20.¹ The Government is not opposed to this extension.

At this time, the parties do not believe that it is necessary to continue the trial setting, unless the Court decides to do so as a result of extending the motions deadline.

This motion is made in the interests of justice and not to delay the proceedings. Defendant requests that the Court grant this motion.

Respectfully submitted,

/S/ Josh Schaffer
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Attorney for Defendant
GREGG CARL BAIRD

¹ The parties are scheduled to meet on November 11 to discuss the case, which is the next date that both the prosecutor and defense counsel are available to meet.

CERTIFICATE OF CONFERENCE

I conferred with Sherri Zack, Assistant United States Attorney, on October 27, 2015, and she does not oppose this motion.

/S/ Josh Schaffer
Josh Schaffer

CERTIFICATE OF SERVICE

I served a copy of this document on Sherri Zack, Assistant United States Attorney, by electronic filing on October 27, 2015.

/S/ Josh Schaffer
Josh Schaffer

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ORDER

Baird's Unopposed Motion For An Extension Of Time To File Pre-Trial Motions is **GRANTED**. Baird's pre-trial motions, if any, must be filed by November 20, 2015.

Signed at Houston, Texas, on October _____, 2015.

David Hittner
United States District Judge